

Return Date and Time: August 19, 2014 at 10:00 a.m.
Objection Deadline: August 12, 2014 at 5:00 p.m.

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Andrew H. Madoff individually and as Executor
of the Estate of Mark D. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re: BERNARD L. MADOFF,
Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

THE ESTATE OF MARK D. MADOFF, ANDREW
H. MADOFF, individually and as Executor of the
Estate of Mark D. Madoff, and STEPHANIE S.
MACK,

Defendants.

Adv. Pro. No. 08-01789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 09-1503 (BRL)

Related Doc: 184

**DECLARATION OF ANDREW
J. EHRLICH IN SUPPORT OF
THE OPPOSITION OF
DEFENDANTS ESTATE OF
MARK D. MADOFF AND
ANDREW H. MADOFF TO THE
TRUSTEE'S MOTION FOR
LEAVE TO FILE A THIRD
AMENDED COMPLAINT**

I, Andrew J. Ehrlich, declare pursuant to 28 U.S.C. § 1746:

1. I am a member of the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019-6064, attorneys for defendants the Estate of Mark D. Madoff and Andrew H. Madoff in the above-captioned action. I submit this declaration in support of the Opposition of the Estate of Mark D. Madoff and Andrew H. Madoff to the Trustee's Motion for Leave to File a Third Amended Complaint.

2. Attached as Exhibit 1 hereto is a true and correct copy of the Final Judgment entered in *Madoff Securities International Ltd. v. Raven & Ors* [2013] EWHC 3147 (Comm.) (Eng.) (Poplewell, J.).

3. Attached as Exhibit 2 hereto is a true and correct copy of a blackline comparing the proposed Third Amended Complaint (excluding exhibits) to the Second Amended Complaint, filed in this action on May 4, 2012.

4. I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: August 12, 2014.



Andrew J. Ehrlich